

MICHELE BECKWITH
Acting United States Attorney
MATHEW W. PILE, WSBN 32245
Associate General Counsel
Office of Program Litigation, Office 7
Social Security Administration
JUSTIN L. MARTIN, MO 62255
Special Assistant United States Attorney
6401 Security Boulevard
Baltimore, Maryland 21235
Telephone: (206) 615-3735
E-Mail: justin.l.martin@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

MAKAYLA M. RUSSELL o/b/o P.R.,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 1:24-CV-01356-GSA

STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE THE
ELECTRONIC CERTIFIED
ADMINISTRATIVE RECORD AS THE
ANSWER TO PLAINTIFF'S COMPLAINT

Pending the Court's approval, the parties stipulate through their respective counsel that Defendant, the Commissioner of Social Security (the "Commissioner"), shall have a thirty-two-day extension of time to respond to Plaintiff's Complaint in this case from February 27, 2025, up to and including March 31, 2025. In support of this request, the Commissioner respectfully states as follows:

1. Defendant's response to Plaintiff's Complaint is due to be filed by February 27, 2025.

1 Defendant previously requested an extension of this deadline. ECF No. 10.

2 2. Despite working diligently to meet the case deadlines, Defendant needs additional
3 time in the instant case to consult with the client agency to determine the appropriate
4 response.

5 3. For this reason, I am requesting an extension to March 31, 2025 (32 days), to file an
6 Answer or other response in this matter.

7 4. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that
8 he has no objection to this extension request.

9 5. This request is made in good faith and is not intended to delay the proceedings in this
10 matter.

11 6. I am attempting to preserve limited judicial resources and have applied the most rapid
12 response under the circumstances.

13 WHEREFORE, Defendant requests until March 31, 2025, to respond to Plaintiff's
14 Complaint.

15 ///

Respectfully submitted,

DATE: February 25, 2025

SACKETT & ASSOCIATES, PC

/s/ Harvey Peter Sackett*

HARVEY PETER SACKETT

Attorney for Plaintiff

(*as authorized via email on February 25, 2025)

MICHELE BECKWITH

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Social Security Administration

DATE: February 25, 2025

By s/ Justin L. Martin

JUSTIN L. MARTIN

Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: **February 25, 2025**

/s/ Gary S. Austin

UNITED STATES MAGISTRATE JUDGE